

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

**NOTICE OF FIRST APPLICATION FOR COMPENSATION OF THE LIQUIDATING TRUSTEE OF
THE GALARDI CREDITORS TRUST, DEADLINE TO OBJECT, AND FOR HEARING**

PLEASE TAKE NOTICE that a *First Application for Compensation of the Liquidating Trustee of the Galardi Creditors Trust* (the "Application") has been filed in the above case. Pursuant to the Application, the Court is requested to allow and award compensation to Thomas T. McClendon, as the Liquidating Trustee of the Galardi Creditors Trust ("Trustee"), as follows:

- (1) \$164,044.00 representing fees;
- (2) \$5,652.64 representing actual out-of-pocket expenses incurred; and
- (3) that the Liquidating Trustee be authorized and directed to pay the \$169,696.64 requested award to the Liquidating Trustee from the Galardi Creditors Trust.

YOUR RIGHTS MAY BE AFFECTED. You should read these documents carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one. If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the motion may be obtained upon written request to counsel for the Movant (identified below) or at the Clerk's office.

If you do not want the court to grant the relief sought in the Application or if you want the court to consider your views on the Application, then you or your attorney shall file with the court a written objection or response on or before **February 23, 2024**, pursuant to Fed.R.Bankr.P. 9006(f). If you are receiving this notice by mail, you may add three (3) days to the response date stated above. The objection or response should be sent to: Clerk, U.S. Bankruptcy Court, Middle District of Georgia, P.O. Box 1957, Macon, GA 31202, (478) 752-3506.

If an objection or response is filed, a hearing on the Application shall be held on **March 6, 2024, at 11:00 a.m. at the U.S. Bankruptcy Court, Macon Courthouse, Courtroom A, 433 Cherry Street, Macon, Georgia 31201**. If you mail your response or objection to the Court for filing, you shall send it early enough so that the court will receive the objection or response on or before the date stated above. Any response or objection shall also be served on the Trustee.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting relief.

This notice is sent by the undersigned pursuant to LBR 2016(c)(2).

Respectfully submitted this 2nd day of February, 2024.

/s/ Thomas T. McClendon
Thomas T. McClendon
Georgia Bar No. 431452
Jones & Walden LLC
699 Piedmont Avenue, NE
Atlanta, Georgia 30308
404-564-9300
tmccclendon@joneswalden.com
Liquidating Trustee

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

**FIRST APPLICATION FOR COMPENSATION OF THE
LIQUIDATING TRUSTEE OF THE GALARDI CREDITORS TRUST**

TO: THE HONORABLE JAMES P. SMITH
CHIEF JUDGE, U.S. BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

COMES NOW Thomas T. McClendon, as Liquidating Trustee of the Galardi Creditors Trust (the "Trustee"), and files this, his *First Application for Compensation of the Liquidating Trustee of the Galardi Creditors Trust* (the "Application"), and in support thereof respectfully shows as follows:

1. On or about January 27, 2022, (the "Petition Date"), Teri G. Galardi (the "Debtor") filed a petition for relief under Chapter 11 of Title 11, United States Code, 11 U.S.C. §§ 101 et seq.
2. On April 10, 2023, Debtor filed an Amended Joint Chapter 11 Plan of Reorganization (Doc. No. 401) ("Plan"). The Plan provided for the Debtor's establishment of a liquidating trust for the benefit of the Holders of Class 8 Unsecured Claims and the execution of a Trust Agreement for the Galardi Creditors Trust ("Trust Agreement") to be in effect on the Effective Date of the Plan.
3. On April 14, 2023 (the "Appointment Date"), the Court entered the Order Confirming Joint Plan of Reorganization (Doc. No. 410) ("Confirmation Order") confirming the Plan, authorizing the execution of the Trust Agreement, and appointing the Trustee.
4. On April 25, 2023, Debtor and Trustee executed the Trust Agreement.
5. The Court has jurisdiction over this Application pursuant to Article 9.1(m) of the Plan (retention of jurisdiction over all matters regarding or related to the administration of the Galardi Creditors Trust) and Section 7.2 of the Trust Agreement.

6. The Trustee shows that he has served as the Liquidating Trustee of the Galardi Creditors Trust in this case since the Appointment Date.

7. The Trustee makes his Application for the allowance of compensation for professional services rendered to the Trustee for the period of time from April 14, 2023, through January 31, 2024 ("Application Period"), pursuant to Section 4.8 of the Trust Agreement, and to the extent applicable, 11 U.S.C. §§ 330 and 331. All services for which compensation is requested were performed by the Trustee on behalf of the Galardi Creditors Trust and not on behalf of any other party, creditor, persons or party in interest.

8. The Trustee has performed services required of a Liquidating Trustee in the administration of the Galardi Creditors Trust, including but not limited to making distributions to Holders of Class 8 Unsecured Claims.

9. Pursuant to Section 4.8 of the Trust Agreement, the Trustee "will be paid at their standard hourly rate customarily charged to other clients."

10. The time expended by the Trustee and the work performed by the Trustee, for the period for which this Application is made, is duly itemized and set forth in Exhibit "A" which is attached hereto and incorporated herein by this reference.

11. The out-of-pocket expenses incurred by the Trustee during the period for which this Application is made are duly itemized and set forth in Exhibit "A" which is attached hereto and incorporated by this reference. The copy costs reflected on Exhibit "A" are charged at the rate of \$0.10 per page. The facsimile costs are charged at the rate of \$1.00 per outgoing page.

12. The Trustee has not agreed to share any compensation awarded in this case with any person other than members of Trustee's law firm.

13. The Trustee respectfully makes the following representations with regard to the 12-factor Johnson test, to the extent the same is applicable:

- (a) Time and Labor Required: The Trustee has expended a total of 490.80 hours through January 31, 2024, at the following rates:

<u>Attorney(s)</u>	<u>Hourly Rate</u>
Tom McClendon	\$325.00-\$395.00

Such rates are those rates as are customarily charged to other clients.

- (b) Novelty and Difficulty of Questions Presented: The Chapter 11 reorganization case involves the administration of the Galardi Creditors Trust including the resolution of distribution disputes and making distributions on more than \$20 million in unsecured claims. The Trustee shows that the novelty and difficulty of questions presented are more than those normally associated with a Chapter 11 bankruptcy case.
- (c) Skill Requisite to Perform Legal Services Properly: The Trustee respectfully represents that he has the skill requisite to perform the trustee services previously rendered in a proper fashion.
- (d) The Preclusion of Other Employment Due to Acceptance of the Case: The Trustee respectfully requests that the time expended by the Trustee in connection with this case could have been devoted to other matters, but for the time demands placed upon the Trustee by his involvement in this case.
- (e) Customary Fee for the Type of Services Rendered: The Trustee shows that all fees requested by the Trustee were generated by applying the Trustee's normal hourly billing rate to the number of hours actually expended. Such itemization is detailed on Exhibit "A".
- (f) Whether Fee is Fixed or Contingent: The Trustee's charges are subject to being awarded by this Court under 11 U.S.C. § 330 and the Trust Agreement. The Fee is thus not truly fixed or contingent but has some characteristics of both.
- (g) Time Limitations Imposed by Client or Other Circumstances: The Trustee shows that many of the services rendered have been performed under exacting time limitations imposed by the nature of the case.
- (h) Amount Involved and Results Obtained: The Trustee has handled and is continuing to handle a large number of issues as the Liquidating Trustee in this case. The Court entered the Confirmation Order on April 14, 2023. The Trustee has served since the Appointment Date.

- (i) Experience, Reputation, and Ability of Attorneys: The Trustee respectfully represents that he has had a significant amount of experience in bankruptcy cases in this District.
- (j) Undesirability of the Case: The Trustee respectfully represents that this factor is not normally applicable to a Chapter 11 case but that this case does include unusual challenges.
- (k) Nature and Length of Professional Relationship with the Client: The Trustee shows that he has served as the Liquidating Trustee in this case from his appointment. Prior to the Appointment Date, the Trustee represented the Committee of Unsecured Creditors in this case. The Committee dissolved and has ceased to exist since the Effective Date of the Plan, April 14, 2023.
- (l) Awards in Similar Cases: The Trustee respectfully represents that his Application is in keeping with similar applications for Chapter 11 compensation filed in bankruptcy cases within this district.

14. The Trustee requests that any order entered granting this Application, once entered, be effective immediately by providing that any 14-day stay is waived under Bankruptcy Rule 6004(h).

WHEREFORE, the Trustee prays that it be allowed Chapter 11 compensation as follows:

- (1) \$164,044.00 representing fees;
- (2) \$5,652.64 representing actual out-of-pocket expenses incurred; and
- (3) that the Liquidating Trustee be authorized and directed to pay the \$169,696.64 requested award to the Liquidating Trustee from the Galardi Creditors Trust.

RESPECTFULLY SUBMITTED this 2nd day of February, 2024.

/s/ Thomas T. McClendon
Thomas T. McClendon
Georgia Bar No. 431452
Jones & Walden LLC
699 Piedmont Avenue, NE
Atlanta, Georgia 30308
404-564-9300
tmccclendon@joneswalden.com
Liquidating Trustee

EXHIBIT "A" FOLLOWS

Document Page 8 of 37
JONES & WALDEN, LLC
 Attorneys At Law

699 Piedmont Avenue, NE * Atlanta, GA 30308
 404-564-9300 • www.joneswalden.com

Galardi Liquidating Trust
 c/o Tom McClendon, Trustee
 699 Piedmont Avenue NE
 Atlanta, GA 30308

Page: 1
 February 2, 2024
 Account No: 2345.006
 Invoice No: 67955

Re: Liquidating Trustee for Galardi Liquidating Trust

Fees

			Rate	Hours	
04/17/2023	TTM	review interest rates for money market accounts (.3 at no charge); conf LSJ; email insurance broker re: insurance for properties (.4).	325.00	0.40	130.00
04/18/2023	TTM	review local rule on claim objection; start drafting claim objection form (.6); t/c Chris Edwards, Steven Runford re: tax implications for liquidating trust (.7); t/c from Jamie Parker (.2).	325.00	1.50	487.50
04/21/2023	TTM	draft form claim objection; review claims for objection; conf KLR re: drafting (.8); conf LSJ, t/c Chris Terry re: check to set up trust bank account (.1).	325.00	0.90	292.50
04/26/2023	TTM	email attorneys on attorney fees claims; call from Mutepe re: same (1.0); editing claim objections (1.3).	325.00	2.30	747.50
04/27/2023	TTM	submitting insurance applications for trustee insurance (.5).	325.00	0.50	162.50
04/28/2023	TTM	t/c ainsworth re: claim of liens (.2); continue drafting claim objections (1.3).	325.00	1.50	487.50
05/01/2023	TTM	Email staff providing directions for creditors' calls (.2); continue working on claim objections; obtain EIN number for trust, call/emails with banker on trust bank account; complete bank account opening paperwork, call with Steven Rumsford re: EIN application (1.9); call with Astrid Gabbe & Chris (.6); complete and sign listing agreement with Paul Hanna, email same; call Sarah Riedel's office re: attorneys' claims (.7); email Paul Hanna re: addendum; email banker re: corrected form; email Astrid re: 11th Cir. appeals claim objections (.5); draft Bank of America claim objection (.3); email Ainsworth re: Mays Proof of Claim, Mutepe re: Griffin Proof of Claim, draft objections to proof of claims (1.0).	325.00	5.20	1,690.00
05/02/2023	TTM	conf TV re: finalizing claims (.1); opening bank account & online access, checks, email Chris Terry warranty deed for Frontage (.5).	325.00	0.60	195.00
05/03/2023	TTM	travel to bank to deposit check, confirm opened account; email			

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
		Chris Terry re: wire instructions; conf EW re: bookkeeping for trust (.8); email, call Southstate re: bank account online access (.3); call with Mutepe re: claim W-9s, distributions (.5); follow up with Kathleen re: insurance policy (.1); final review of claim objections, call from BK court re: notice for same (.3); call from Lou re: Frontage deed; conf LSJ re: same; conf TV re: edits (.5); set up online access (.2); t/c from Kathy (Chris Terry's office) re: confirmation of wire (.2);	325.00	2.90	942.50
05/04/2023	TTM	t/c Ainsworth re: status, need for objecting to claims before pro rata distributions (.3); confirm wire receipt (.1); email Gabbe re: contingency claims; drafting Gabbe claim objections; t/c from Jammie Parker re: claim objection; lengthy conf with LSJ re: handling legal claims; email Gabbe re: discussion tomorrow (3.1).	325.00	3.50	1,137.50
05/05/2023	TTM	t/c Astrid & Chris re: contingency claims, Parker/Williams/Johnson claims (whether dismissed with prejudice or without) (.7); conf TV re: Parker/Williams/Johnson claims (.3); review DSD, hypothecation, Frontage Rd. deed, conf LSJ re: effective of substantive consolidation; edits to same; email Chris & Lou re: signing same (.6).	325.00	1.60	520.00
05/08/2023	TTM	t/c Mutepe Akemon re claim (.4)	325.00	0.40	130.00
05/09/2023	TTM	t/c Ainsworth re: outstanding issues (.4); conf TV re: drafting contingency fee objections (.3); t/c Paul Hanna re: Frontage Rd offer, call on interest on funds held in bank account (.4 at no charge)	325.00	0.70	227.50
05/10/2023	TTM	follow up with Chris re: execution of documents (1); edits to Gabbe claim objections, continue on Torres, email TV re: filing Gabbe claim objections (.5).	325.00	0.60	195.00
05/11/2023	TTM	t/c Paul Hanna re: Frontage potential offers, need for repairs (.3); t/c Chris Terry re: outstanding items; t/c Paul, follow up text to same (.2).	325.00	0.50	162.50
05/15/2023	TTM	email Paul Hanna (.2); email Chris & Lou re: documents (.3); t/c Steven (.1); draft letter to beneficiaries (.8).	325.00	1.40	455.00
05/17/2023	TTM	t/c Chris Terry re: motion to compel Ms. Galardi's compliance with Plan; agree to hold off until Friday (.3); work on Torres objection (.4 at no charge).	325.00	0.30	97.50
05/18/2023	TTM	draft letter setting opening balance sheet, update on distributions per trust (.4); finish letter; t/c with Paul Hanna re property; email Chris Edwards re: conversation on letter (.6).	325.00	1.00	325.00
05/19/2023	TTM	review original documents; date same (.2); email Kathleen re: Insurance (.1); call with Chris, Steven Rumsford; finalize letter to beneficiaries, sign same (1.1).	325.00	1.40	455.00

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
05/22/2023	TTM	t/c Paul; conf TV re: deeds; conf EW re: checks, call SouthState bank (.5); recording deed, DSD (.2); t/c Chris re: insurance (.1).	325.00	0.80	260.00
05/23/2023	TTM	t/c Paul Hanna re: electrician (.1).	325.00	0.10	32.50
05/24/2023	TTM	review receipt from Paul; email EW re: payment (.1); review amended claims filed by Gabbe; emails with Gabbe re: same; review claims of liens; save, input into distribution spreadsheet (2.0); email Astrid; review notice of withdrawal of objection to claim 97; email approval to file (.2); finish Torres objection (.1.2).	325.00	3.50	1,137.50
05/25/2023	TTM	t/c Kathleen re: insurance (.1).	325.00	0.10	32.50
05/26/2023	TTM	review liquidating trust agreement; t/c Chanel Warren re: claim, amendment (.6).	325.00	0.60	195.00
05/30/2023	TTM	prepare fee order, t/c Mutepe re: W9s and status update (.7).	325.00	0.70	227.50
06/01/2023	TTM	review E&O policy; email Kathleen (.2); email Gabbe re: dismissal claims (.4); t/c Aida Simmons re: status, claim (.3).	325.00	0.90	292.50
06/12/2023	TTM	review claims order; email Chris re: fees, Paul re: Frontage road repairs (.5).	325.00	0.50	162.50
	TTM	t/c Ainsworth re: claim (.2).	325.00	0.20	65.00
06/13/2023	TTM	t/c from Mutepe & Ainsworth re claims process (.3)	325.00	0.30	97.50
06/14/2023	TTM	review order on claim 57 (.1); t/c from Ainsworth re claims (.3).	325.00	0.40	130.00
06/15/2023	TTM	reviewing claims orders; input in to distribution spreadsheet; t/c Paul Hanna re: roof quotes (.7); t/c Astrid Gabbe and Chris Kosachuk re: objections and responses (.9); conf LSJ re: distribution letters (.2); review Certificate of service on claim objections (.1).	325.00	1.90	617.50
06/16/2023	TTM	t/c Paul re: roof repair, email same (.2); edit and send letter to Red Shield Funding (.4); call Astrid re: possibility of settlement; conf LSJ; prepare for claim objection hearing (1.2).	325.00	1.80	585.00
06/20/2023	TTM	email Astrid re: claim 57 (.1); prepare for hearing on claim objections (1.2); draft proposed order on claim 57 for Astrid's review; email Astrid same (.3); start drafting distribution letter; t/c Mutepe re: his clients (2.0); t/c Jason Orenstein (new local counsel for Gabbe/Parker); review draft consent order from Astrid, email Astrid re: same (1.4).	325.00	5.00	1,625.00
06/21/2023	TTM	attend hearing on claim objections; travel to/from hearing (4.1); t/c Ainsworth (.2).	325.00	4.30	1,397.50
06/22/2023	TTM	t/c Mutepe re: client documents (.2).	325.00	0.20	65.00
06/23/2023	TTM	review current list of addresses and method of distribution from Mutepe for his clients; add other recipients; conf BM re: same			

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
		(1.1).	325.00	1.10	357.50
06/26/2023	TTM	drafting distribution letter forms (.5); meeting with Resheedah Mays (.4); conf BW; CP re: printing POCs and engagement letters for distributions letters review (.1); drafting distribution letter forms; call to/from Mutepe, Mays; Ainsworth, Brewer re: distributions (3.4); continue drafting letter forms (1.2); email Astrid; Red Shield Funding re: reserve order (.1); conf BD re: general creditors letters (.1).	325.00	5.80	1,885.00
06/27/2023	TTM	reviewing distribution chart; checking supporting documentation (.9); conf EW re: cutting checks, wires; emails to creditors re: questions (.8); call with Addie Brooks (.4); follow up call with Addie Brooks (.2); continue to review supporting documentation; email Mutepe and Ainsworth with remaining needs (1.4); call with Mutepe re: distribution letter requests (.3).	325.00	4.00	1,300.00
06/28/2023	TTM	t/c Ainsworth re: his clients; conversation with Harland's new lawyer (.3); prepare for, attend zoom call with Mays, Brewer, Dudley and Gabbe re: claim of lien, follow up call with Mays (1.8).	325.00	2.10	682.50
06/29/2023	TTM	email Tiffany Thompson (.1); t/c Ainsworth; email Astrid; work on distribution letters, including checking W-9, identification (1.2); continue working on letters (5.3).	325.00	6.60	2,145.00
06/30/2023	TTM	reviewing distribution letters; checking W-9s, identification; confirming correct amounts; calls with Mutepe & Ainsworth re: distributions (2.9); continue with letters (4.0).	325.00	6.90	2,242.50
07/05/2023	TTM	editing and reviewing creditor distribution letters (4.1); same (1.0); same (1.6); same (1.3).	325.00	8.00	2,600.00
07/06/2023	TTM	editing and reviewing letters (3.0); t/c from Mutepe re: Bain claims (.5); reviewing Bain numbers re: interpleading (.9); conf LSJ re: same; email Gabbe, Harland's estate lawyer, Mutepe & Ainsworth re: same (.9); start drafting motion to approve disbursements on fees for Bain claims (.6 at no charge)	325.00	5.30	1,722.50
07/07/2023	TTM	t/c from Mutepe & Ainsworth re: potential settlement (.2); same (.5); draft letters to holders of disputed claims re: disputed claim reserve (.5).	325.00	1.20	390.00
	TTM	drafting motion to authorize disbursement on Bain attorneys' fees claims (5.7)	0.00	5.70	0.00
07/10/2023	TTM	conf BD; t/c Addie Brooks (.2); calculations on attorneys' fees; t/c Mutepe re: settlement; try Astrid (no answer) (.9); t/c Mutepe (.4); draft settlement agreement between Akemon and Gabbe (1.0); t/c Mutepe re: letters (.2); t/c from Chris Terry re: Gabbe claims (.4); final review of letters (2.2)	325.00	5.30	1,722.50
07/11/2023	TTM	reviewing letters to sign; t/c from Ameera Brewer re: claims, potential settlement; email Ainsworth & Astrid re: same (1.9); t/c			

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
		from Mutepe re: changes; updates on distribution method; edits to letters (1.7); editing disputed claim letters (.5); call with James Atwood; t/c Mutepe; conf LSJ re: confirming email; send email confirm escrow of attorneys' fees on Bain between Akemon and Atwood (1.4).	325.00	5.50	1,787.50
07/12/2023	TTM	editing Bain letters for distribution (attorneys' fees reserve agreed to) (.7); continue same (1.9); sending out letters (signing, confs BD, EW re: same (.6); continue same (.6); continue same (1.0); continue same (1.3); travel to South State Bank to open Disputed Claim Reserve account and additional savings account, t/c Tallulah re: IRS wiring instruction (1.3); reviewing Ainsworth's signed letters for distribution tomorrow (.5).	325.00	7.90	2,567.50
07/13/2023	TTM	review claims for payment; meeting with Belinda Harris to explain distributions (1.2) first batch of wires; travel to/from SouthState Bank (2.9); continue reviewing completed letters; updating distributions (.8); same (.1); t/c Mutepe; conf LSJ; write checks; t/c SouthState Bank re: sending wires online (.8); emails re: distributions, sign Treasury services authorization to send wires online (.3);	325.00	6.10	1,982.50
07/14/2023	TTM	set up online wiring access (.9); start reply on Parker, Johnson, William claims objection (.5); t/c SSB re: wires (.1); sending out wires (3.1).	325.00	4.60	1,495.00
07/17/2023	TTM	send IRS wire; conf BD re: remaining Bain claims (.4); t/c from Rodrika Jones (angry about wires not being sent last week); meet with Addie Brooks (check pickup), calls from Tramaine Moore (wire into account not able to accept wires) (.8); multiple rounds of conf EW, review wires, release same (2.5); work on reply for Parker, Williams, Johnson objections (.5); continue on wires (2.7).	325.00	6.90	2,242.50
07/18/2023	TTM	drafting reply on Parker, Johnson, Williams objection (.7); conf EW re: wires (.3); review wires (.3); conf LSJ re: res judicata/issue preclusion; finalize reply for filing (1.6); wires; t/c from Ronika Jones; Abri Leahong (1.6); finish approving and releasing wires; conf BD re: outstanding wires (.6); t/c Mutepe re: whether Walker attorney fees already paid (did not - paid Darden & Moore previously) (.3).	325.00	6.40	2,080.00
07/19/2023	TTM	conf BD re: wires; complete insurance application; review pictures of completed roof; emails same to insurance broker to procure insurance after roof issue completed; emails to creditors; conf LSJ re: interpleader (1.3); conf EW; BD re: wires; calls from multiple creditors, including Jenisee Long (disputed claim); t/c Astrid Gabbe re: wire confirmation; new attorney fee claim on Milner creditors based on verbal agreement; email Astrid re: new claim; t/c Ainsworth re: same; review, approve and release wires; conf BD re: remaining items; review and create additional wires; email EW and BD re: remaining items (4.2).	325.00	5.50	1,787.50

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
07/20/2023	TTM	t/c Adam re: Long AP (.2).	325.00	0.20	65.00
07/21/2023	TTM	call with Patricia Redmond re: Florida interpleader for May, Thompson/Warren (.2).	325.00	0.20	65.00
07/24/2023	TTM	email Warren/Thompson (.3); Assmar wire; conf EW re: UST report (.7); t/c from Ainsworth (.2); address Saunders wire (.2); call with Trish Redmond re: Florida interpleader (.3); email response to Warren/Thompson (.4).	325.00	2.10	682.50
07/25/2023	TTM	travel to SSB; open up savings accounts at SSB for disputed claims reserve (1.6); conf EW re: reconciliation; email to Red Shield Funding (.8).	325.00	2.40	780.00
07/26/2023	TTM	t/c Chris (Debtor counsel) re: debtor's attempts at getting loan to pay off promissory note (.5); drafting email to Red Shield Funding (.4); conf EW re: reconciliation report to UST (.2); conf LSJ re: Red Shield; t/c from Ashley Armstrong (check not clearing - bank refusing to release hold) (.4); finish email to Red Shield Funding (.2); t/c Trish re: Florida indemnity; review engagement letter, email re: same to conform to Liquidating Trust Agreement (.2); conf AE re: Long AP complaint drafting (.1).	325.00	2.00	650.00
07/27/2023	TTM	conf EW re: UST report; reserve accounts (.3); t/c Rasheedah Mays; email AG and AD relaying settlement proposal (.5); review and sign insurance binder (.2); email UST report to Elizabeth Hardy (.1); email Red Shield Funding re: claims of fraud and statute of limitation; t/c Ainsworth re: same (1.1); conf AE re: Long complaint; research re: same (1.3).	325.00	3.50	1,137.50
07/28/2023	TTM	emails re: interpleaders (.5); reviewing Long adversary (.6); lengthy email to Thompson/Warren re: need for interpleader (.5); finishing edits to Long adversary (.4); emails to Trish re: Florida complaint (.2); t/c from Paul re: Frontage Road property (.3).	325.00	2.50	812.50
07/31/2023	TTM	t/c Chris re: consent order; emails with Rhonda re: same, continuing objection to 57 (.3).	325.00	0.30	97.50
08/01/2023	TTM	email Astrid re: Mays claim (.1); review Mays/Thompson interpleader (.7); emails on same; insurance (.3); respond to note modification request by Galardi (.4).	325.00	1.50	487.50
08/02/2023	TTM	investigate Wright check (reported not received); email Ainsworth tracking number; address delivered, conf EW re: stop check (.2); conf BD re: Wright check (.1).	325.00	0.30	97.50
08/04/2023	TTM	email Red Shield re: claim objection to 110; draft and file same (1.2).	325.00	1.20	390.00
08/07/2023	TTM	email TV re: service of Long AP summons and complaint; email Trish re: service of May/Thompson case (.2); draft response to Thompson bar complaint filing (.7); emails to Red Shield			

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
		Funding; Warren re: claims (.2).	325.00	1.10	357.50
08/08/2023	TTM	t/c from Chris Terry re: loan to pay off note (.1).	325.00	0.10	32.50
08/09/2023	TTM	email re: Red Shield Funding objection hearing date (.2).	325.00	0.20	65.00
08/10/2023	TTM	t/c from Ainsworth re: King claim lien (.1).	325.00	0.10	32.50
08/11/2023	TTM	t/c Paul Hanna re: offer on Frontage (lowball) (.2).	325.00	0.20	65.00
08/14/2023	TTM	research on dual motion for reconsideration and appeal (.3); conf AEE re: Parker reconsideration (.2).	325.00	0.50	162.50
08/16/2023	TTM	t/c Trish Redmond re: Red Shield Funding email (.2); email Chris Kusachuck re: Williams MRAS (.1).	325.00	0.30	97.50
08/18/2023	TTM	email Astrid re: Milner claims (.1); t/c from Ainsworth (.2); email Trish re: Thompson interpleader response (.1).	325.00	0.40	130.00
08/21/2023	TTM	edits to motion to interplead (Long) (.4); t/c from Mutepe re: requests to transfer claims; loan money on claims (can't transfer claims), current status of case (.4).	325.00	0.80	260.00
08/22/2023	TTM	Call Paul Hanna (R.E.) re: offer on Frontage (.3).	325.00	0.30	97.50
08/23/2023	TTM	finalize motion for interpleader (Long) (.2); email Chris Terry re: Williams MRAS (.1); emails to Rhonda Thomas re: Williams MRAS; Long Interpleader hearing date (.2).	325.00	0.50	162.50
08/24/2023	TTM	edits to Long motion to deposit (.2).	325.00	0.20	65.00
08/25/2023	TTM	email Ainsworth re: Long stipulation (.1); drafting response to motion for reconsideration by Jammie Parker (.9).	325.00	1.00	325.00
08/28/2023	TTM	t/c Chris Terry re: Galardi not making payment, options (.4); conf LSJ re: options (.3); conf LSJ re: Gabbe subpoena; t/c Trish re: same, learn suspended pending mediation (.6); t/c from Ronika Jones (.3); t/c Jackie Galardi Torres (.1); t/c Chris Terry; draft motion to authorize, review forbearance agreement; email Chris same (1.5); review edits by Chris to forbearance agreement (.1).	325.00	3.30	1,072.50
08/29/2023	TTM	t/c Chris re: forbearance motion (.2); draft motion for ex parte or emergency hearing, conf TV re: filing (.4); filing motions, t/c, email Rhonda (.3); review claim objections by by Jason Orenstein (.6); t/c Jason re: same (.5); t/c Teresa (Clerk's office) re: motion for ex parte (.3); draft order on motion; certification of need for expedited (.2); t/c Mutepe & Ainsworth re: claim objections (.5); email Rhonda; sign forbearance agreement; email Chris (.2); conf MG re: reply on Kusachuk transfer (.2).	325.00	3.40	1,105.00
	TTM	Attend call with environmental attorney re: Frontage Road property (not engaged)(.9).	325.00	0.90	292.50
08/30/2023	TTM	edit reply in support of motion to disallow transfer to Kosuchuk;			

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
		edits to Parker motion for reconsideration (.3); t/c from Ainsworth, Mutepe re: standing question (.5); conf EW re: Hanna reimbursements for Frontage Rd (.3); call with Paul re: understanding reimbursement requests (.1); review invoices for Liquidating Trustee; Jones & Walden; edits and no-charges to same (1.0); research dicta issue for Parker response (.2); t/c Ebony Mayfield re: status (.1).	325.00	2.50	812.50
08/31/2023	TTM	t/c Tessa re: response to motion for reconsideration (two filed motions for reconsideration) (.1).	325.00	0.10	32.50
09/01/2023	TTM	t/c from Ainsworth re: conversation with Jason Orenstein (.1); accept service of subpoena from Gabbe requiring response on 9/5 at noon; email Trish & Ryan; email Astrid to confirm response not required (.3); t/c Ryan re: subpoena, thought that was suspended, email from Astrid not suspended (.2); calls to Trish & Ryan re: filing a motion for protective order (.5); conf AEE re: Rule 26(f) report for Long AP (.1).	325.00	1.20	390.00
09/05/2023	TTM	email Orenstein (.1); t/c from Jason (.4); t/c Chris Tierney re: Red Shield contact (.1); start response to Red Shield (.3); t/c Ryan Walis (Florida counsel) (.1); continue response to Red Shield; t/c from Mutepe (.5); email Jason re: subpoena in Long interpleader (.2); email Rhonda (.1); t/c from Mutepe re: Red Shield (.4); finish email response to Red Shield; give to LSJ for review (.3); prepare appellee's designation - Parker appeal (.7); t/c Chris Terry (.5); redline response to Thompson motion to dismiss (May/Thompson interpleader) (.6).	325.00	4.30	1,397.50
09/06/2023	TTM	attend hearing on objection to transfer claim 98, meeting with Jason Orenstein; travel to/from Macon (4.4); draft order sustaining objection to transfer claim 98 (.2).	325.00	4.60	1,495.00
09/07/2023	TTM	conf LSJ re: Red Shield demand (.2); t/c Paul Hanna re: Frontage offer, counter (.2).	325.00	0.40	130.00
09/08/2023	TTM	t/c Paul re: Frontage road offer (.1); conf LSJ; conf BS re: Red Shield response (.3); draft letter to Red Shield (1.7); t/c Mutepe (.2); t/c Ainsworth (.4); t/c Ainsworth re: claim objections (.5).	325.00	3.20	1,040.00
09/11/2023	TTM	review Frontage contract; request for survey; t/c Paul re: same (.7); t/c from Ainsworth re: claim objections (.5).	325.00	1.20	390.00
09/12/2023	TTM	email Paul re: Frontage contract (.2); review Mays/Thompson initial disclosure; email re: same (.1); sign Frontage contract (.1).	325.00	0.40	130.00
09/13/2023	TTM	drafting response to Long motion to dismiss (2.8); email BD re: Williams Notice of Hearing; review (.2); t/c from Chris Terry re: loan, closing (.1).	325.00	3.10	1,007.50
09/14/2023	TTM	review letter on Parker appeal; calendar deadlines (.2).	325.00	0.20	65.00
09/15/2023	TTM	t/c from Ainsworth re: potential global settlement with Gabbe (.5);			

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
		email James Attwood (respond to inquiry on plan distribution timeline) (.1).	325.00	0.60	195.00
09/18/2023	TTM	edits to payoff letter (.4); start working on second distribution calculations (1.0); t/c Ainsworth re: settlement with Gabbe (.4); email Jason re: discussion (.1); t/c Mitchell Benjamin (new attorney for estate of Harlan Miller) (.2).	325.00	2.10	682.50
09/19/2023	TTM	t/c Jason Orenstein re: settlement discussions (.4); email bullet points to Jason (.3); t/c from Ainsworth re: settlement (.2); drafting response to motion to dismiss in Long interpleader (1.3).	325.00	2.20	715.00
09/21/2023	TTM	review LSJ redlines; final edits (.5); conf LSJ, DM re: filing Long response (.1); t/c from Ainsworth re: potential settlement; next week's objections (.6); t/c from Mutepe re: objection, reaching out to new lawyer for Miller's estate (.4); emails with Rhonda Thomas and Jason Orenstein re: next week's hearings (.2); t/c Jason re: potential settlement, next week's hearings (.3).	325.00	2.10	682.50
09/22/2023	TTM	t/c Ronika Jones (creditor) re: distribution timing (.2); t/c Chris Terry re: loan; email payoff to Chris, Jim (lender's counsel) (.2); conf BD re: getting Torres signed distribution letter, W-9 and DL (.1); review Jason Orenstein's email re: Wednesday calendar; review calendar; conf CP re: matching up objections (.2).	325.00	0.70	227.50
09/25/2023	TTM	t/c from Ainsworth re: Wednesday hearing (.7); t/c from Mutepe re: call-in number (.1); prepare for Long hearing (1.1); attend hearing (.8).	325.00	2.70	877.50
09/26/2023	TTM	email Jason re: tomorrow's hearings (.1); review Torres claims for payment (.1); t/c from Ainsworth (.4); t/c Jason re: hearing (.5); t/c Chris Edwards re: invoice (.1); review Torres check and withdrawal of objection to claim (.1)	325.00	1.30	422.50
09/27/2023	TTM	attend hearing on objections to 57 and 110; travel to/from (5.5)	325.00	5.50	1,787.50
09/29/2023	TTM	draft order authorizing release of 65% of claim for Red Shield (.5); email same (.1); t/c Paul re: environmental affidavit (.2).	325.00	0.80	260.00
10/02/2023	TTM	t/c Ramika Jones (creditor) (.1).	325.00	0.10	32.50
10/03/2023	TTM	draft status report on interim consent order (57/110) (.7); finish status report; edit order on same (.5); email Red Shield, Thompson parties (.3); t/c Ainsworth re: Thompson settlement (.2); t/c from Alexis King (.1);	325.00	1.80	585.00
10/04/2023	TTM	review lengthy email from Astrid on alleged Gurnsey fraud; t/c, email Jason (.3); t/c Tiffany Thompson (.3); t/c Jason re: allegations of fraud (.5); t/c Trish; t/c Ainsworth re: settlement (.4); transfer funds to saving account; review and approve DSD releases (.5); review Sterns Weaver bill; conf LSJ (.4); t/c Jason Orenstein (.3).	325.00	2.70	877.50

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
10/05/2023	TTM	t/c Jason Orenstein (.1); call from Ms. Thompson (.2); call from Mutepe on May settlement (.2); t/c Jason Orenstein re: settlement, Teresa Irby re: who is Chris Kosachuk (.5); zoom call with Rasheedah Mays (.8); t/c Mutepe re: Chris' response to settlement offer (.2).	325.00	2.00	650.00
10/06/2023	TTM	Drafting motion for emergency hearing on claims (.9); t/c from Tiffany Thompson (.4); continue working on motion (2.2); review LSJ's edits; continue working on motion (1.4); t/c Paul Hanna re: request to extend due diligence (.1).	325.00	5.00	1,625.00
10/09/2023	TTM	continue working on motion for violation of automatic stay; communications on Thompson motion (1.8); redline Thompson order (.2); continue on motion (1.1); t/c Jason Orenstein re: Darden order, demand for payment (.3); conf BD, email Theresa Irby on notice for objection to Shakir Williams claim (.1).	325.00	3.50	1,137.50
10/10/2023	TTM	finish automatic stay motion (1.5); t/c Mutepe re same (.1); draft lengthy response to Orenstein email alleging everyone is out to get Astrid and lack of due diligence on Guernsey detailing steps taken (1.0); review fee applications (.8).	325.00	3.40	1,105.00
10/11/2023	TTM	email response to Red Shield Funding (.1); t/c Paul Hanna re: request for extension on Frontage Rd. (.2); t/c Ainsworth re: Mayfield funds (.4); t/c RSF re: recent claim amendment; t/c clerk re: IP address (.4); t/c Lou McBryan re: Darden filing; email Rhonda re: expedited hearing (.4); conf LSJ re: RSF claim amendment (.5); continued conference with LSJ; draft letter to United States Trustee; draft order setting hearing on violation of automatic stay, claim objections and upload same, start trial prep for hearing (3.7).	325.00	5.70	1,852.50
10/12/2023	TTM	preparing for hearing (conf BS, BM re: research questions, exhibits, calls regarding facts, preparing direct exams for witnesses) (1.5); drafting motion to strike second Williams transfer (.3); call with Trish Redmond on interpleader order vs bk order (.1); call with Tiffany Thompson re: same (.2); call with Ryan Wolis re: same (.1); emails with Rhonda re: order; Certificate of service (.2); continue trial prep (7.7).	325.00	10.10	3,282.50
10/13/2023	TTM	continue preparing for trial on motion for automatic stay, including working on direct examinations and exhibits, calls on potential witnesses and exhibits (7.7).	325.00	7.70	2,502.50
10/14/2023	TTM	finish preparation for trial on automatic stay (2.7).	325.00	2.70	877.50
10/16/2023	TTM	final prep for hearing (1.4); trial on violation of automatic stay; travel to/from (8.3).	325.00	9.70	3,152.50
10/18/2023	TTM	calculate Thompson distributions, emails re: same; conf BD, EW re: sending wire to corresponding bank procedure (.6); follow up conference with BD re: corresponding bank wire (.1); review outstanding items, create checklist (1.1); research ability to bar			

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
		claims and assignments (.7).	325.00	2.50	812.50
10/19/2023	TTM	conf MG re: drafting automatic stay complaint (.7); emails in follow up on Monday's hearing; further conf MG re: complaint (1.3).	325.00	2.00	650.00
10/23/2023	TTM	review emails on Frontage; email Paul with questions (.2); t/c Ainsworth re: encouragement to settle (.3); conf MG re: Gabbe complaint (.1); review transcript of 10/16 hearing; edits to claim transfer objections (.5); t/c Jason Orenstein (.3); draft motion to expedite on claim objections (.3); t/c Paul Hanna re: price reduction, extension of closing (.2); revising complaint against Gabbe (2.9); call with Paul Hanna, environmental consultant; buyer's broker (.5).	325.00	5.30	1,722.50
10/24/2023	TTM	calls with Paul Hana re: closing extension, review emails on same (.5); finalize objections to transfer of claims, start wires for Thompson distributions (.5); t/c from Joe Guernsey (.1); continue wires to Thompson, Gabbe, Dudley and Sterns Weaver (1.8); draft status report of Florida litigation; conf LSJ re: action items (1.1); review fraud complaint; conf LSJ re: same (.7); drafting motion to dismiss fraud complaint (.9).	325.00	5.60	1,820.00
10/25/2023	TTM	t/c Ainsworth re: complaint filed by Gabbe & Kosachuk (.4); t/c FLSD on process of submitting interpleader payment; emails with Mays re: interpleader; deposit (.5); wire interpleader amount (.2); conf LSJ re: response to complaint (.1); conf EW re: UST report (.1); email Astrid Gabbe (.1); t/c Mayfield; Ainsworth; email (.3); review report to UST with EW (1.1); email Jason re: Parker appeal motion; review Notice of Hearing on claim transfer objections (.1); call with LSJ on complaint (.7).	325.00	3.60	1,170.00
10/26/2023	TTM	email Ms. Thomas re: status report, whether to upload order (.1); review frontage road contract amendments; email Paul re: same(.1); review, edits to report to UST (.3).	325.00	0.50	162.50
10/27/2023	TTM	t/c from Mutepe re: what matters on for Wednesday (.2); email Rhonda Thomas re: whether order needed after status report (.3); prepare for call with Gabbe, Kosachuk, and Orenstein (.8); attend call with Gabbe, Kosachuk, and Orenstein, follow up call with LSJ; sketch out potential settlement possibilities (1.7).	325.00	3.00	975.00
10/30/2023	TTM	list out potential settlement on white board (.7); conf LSJ; t/c Dudley; t/c Orenstein (1.4); prep for hearing, t/c from Brooks, Hughes (.5); call with Gabbe, Orenstein, Kosachuk (.7); prep for Wednesday hearing (1.0); conf LSJ; tc/ Orenstein, t/c Dudley (1.2).	325.00	5.50	1,787.50
10/31/2023	TTM	draft term sheet for discussions with Orenstein, Dudley (.9); t/c Dudley; conf LSJ (.5); t/c Orenstein (.5); conf LSJ; email Jason (.3); edits to letter to Fidelity re: confirmation of Thompson disbursement (.2); t/cs with Jason (.4); prep for hearing (.7); call with Ainsworth (.4).	325.00	3.90	1,267.50

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
11/01/2023	TTM	attend hearing on objection, negotiating global settlement with Gabbe and Dudley, travel to/from (9.5).	325.00	9.50	3,087.50
11/02/2023	TTM	vm Guernsey (.1); t/c Joseph Guernsey, Michael de Campo (.8); email same (.1); start drafting settlement agreement (.3); t/c Paul Hanna re: Frontage Rd. closing, flood plain report (.2).	325.00	1.50	487.50
11/03/2023	TTM	drafting settlement agreement (1.5); same (2.4); same (1.7).	325.00	5.60	1,820.00
11/06/2023	TTM	drafting settlement agreement (.9); t/c Ronika Jones re: distribution (.3).	325.00	1.20	390.00
11/07/2023	TTM	conf LSJ re: settlement agreement (.2); edits to same; email to Jason & Ainsworth; email Rhonda Thomas re: date for hearing (1.4).	325.00	1.60	520.00
11/08/2023	TTM	draft motion to approve settlement agreement (.8); t/c Mutepe re: Bain attorneys fees claim (.4); t/c Jason re: settlement agreement (.2); follow up with Ainsworth re: same (.1); draft letter to beneficiaries on status (1.3).	325.00	2.80	910.00
11/09/2023	TTM	calls with Jason Orenstein; review redline from same/Kosachuk/further call re: redline (1.3); emails to Red Shield Funding, Astrid Gabbe (.6); email from/respond to Kosachuk; lengthy call with Kosachuk and Orenstein; editing settlement agreement accordingly; t/c from Mutepe re: Rasheedah Mays terms in agreement (read record) (1.5); conf LSJ re: settlement revisions (.1); conf LSJ re: final redlines, email Jason same (.3).	325.00	3.80	1,235.00
11/10/2023	TTM	follow up with Ainsworth on settlement agreement (.1).	325.00	0.10	32.50
11/13/2023	TTM	t/c Ainsworth re: any comments on settlement agreement (.1); t/c from Mutepe re: setting Astrid's deposition, whether I will attend(.1).	325.00	0.20	65.00
11/14/2023	TTM	follow up with Ainsworth (.1).	325.00	0.10	32.50
11/15/2023	TTM	t/c Ainsworth re: redline (.4); drafting letter to beneficiaries; conf LSJ re: same (.5); t/c Ameera Brewer (.2); t/c Deleston (.2).	325.00	1.30	422.50
11/16/2023	TTM	reviewing redlines from Ainsworth, lengthy call with Ainsworth re: same; incorporate same; email Ainsworth for further review (3.3); t/c Tania Assmar (.2); try AD; conf LSJ re: status (.2).	325.00	3.70	1,202.50
11/17/2023	TTM	conf LSJ; email Ainsworth re: finalizing redlines (.3); review proposed amendment #3, current status of Frontage; try Paul re: same (.3); long call with Ainsworth, redline changes (1.1); conf LSJ re: changes, email redline to AD (.3) t/c Paul Hanna re: request for extension, price adjustment (.2); t/c Brittney Walker re: status (.2); sign Frontage amendment extending due diligence (.1).	325.00	2.50	812.50

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
11/20/2023	TTM	t/c Ainsworth re: redline (.1); t/c Mutepe re: status of Bain attorney fee claim discussion with Harland Miller attorney; calls from creditors (.3); review redline from Ainsworth; t/c Ainsworth re: same; email to Jason; t/c same (1.1); t/c Tiffany Thompson (.3); review emails, t/c Jason (.2).	325.00	2.00	650.00
11/21/2023	TTM	review redlines from Jason; emails re: same (.6); t/c Jason, redlining per conversation (.8); t/c LSJ; brainstorm possible solutions to remaining issue (1.0); conf LSJ; calls with Ainsworth, Jason re: redlines (1.4); conf LSJ, t/c Jason, update redlines (1.3).	325.00	5.10	1,657.50
11/22/2023	TTM	make redlines; give to LSJ to review (.3); conf LSJ, email redlines to Dudley, Orenstein, Kosachuk (.3); edit motion to approve (.3); t/c from Orenstein, Kosachuk; conference call with same, Dudley, make edits and circulate (1.8); second conference call re: settlement agreement (.5); t/c Ainsworth; (.2); call Orenstein (.2); t/c Ainsworth; make requested edits, email to Orenstein (.5).email Ms. Thomas re: setting hearing for correct date (.2)	325.00	4.30	1,397.50
	TTM	after hours filing motion to approve settlement, printing and stuffing mailings, drop off at post office (1.5 - no charge).	0.00	1.50	0.00
11/27/2023	TTM	review docket, email Rhonda (.2); review emails from Red Shield Funding (.3); conf LSJ re: same (.1); email RSF, conf LSJ (.2); t/c Paul Hanna re: Frontage Rd environmental, extension of due diligence (.3); same (.4); t/c with Guernsey (.4); review addresses for status letter to beneficiaries; conf DM (.2); t/c Mutepe re: letter to beneficiaries (.1); t/c from Lygia Simmons (.2); t/c from Amerera Brewer (.2); email from Rhonda, draft motion and order shortening notice (.8).	325.00	3.40	1,105.00
11/28/2023	TTM	t/c Ainsworth re: creditor inquiry on timing (.1).	325.00	0.10	32.50
11/29/2023	TTM	draft lengthy email response to Red Shield Funding (.9).	325.00	0.90	292.50
11/30/2023	TTM	t/c Mutepe re: Bain attorney fee claims (.5); t/c Mitchell Benjamin re: Bain attorney fees claims (.3); t/c Mutepe; Mitchell (.6); t/c Lou McBryan re: settlement (.2); t/c Blake re: service; t/c from Mutepe; t/c TV re: Certificate of service (.2); review, finalize Certificate of service (.4)	325.00	2.20	715.00
12/01/2023	TTM	conf LSJ; BS; t/c Red Shield Funding; t/c Paul Hanna (.7); conf BS re: research (.1); conf LSJ re: Red Shield (.2); t/c Paul Hanna (.1).	325.00	1.20	390.00
12/04/2023	TTM	t/c Guernsey, De Campo re resolution of claim (1.0); t/c Ronika Jones on request for advance (can't authorize) (.1); t/c Mutepe re: same; conf DM re: Jones beneficiary update letter; email Ms. Jones letter (.3).	325.00	1.40	455.00
12/05/2023	TTM	vm Guernsey; Orenstein; calls with same re disputes (1.0); email			

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
		Scott Lasetter re: Frontage Road (.1).	325.00	1.10	357.50
12/06/2023	TTM	conf AEE re: claim splitting (.1); call; email Kosachuk (.1); t/c Mutepe (.1); conf AEE re: claim splitting (.3); conference call RSF (.5); t/c Jason re: claim-splitting (.2); try; email RSF (.1); email Rhonda re: 12/13 calendar (.2); t/c RSF (.1); t/c Mutepe re: settlement RSF (.3); t/c Paul Hanna (.1); t/c Mutepe re: same (.3); follow up with Scott (environmental attorney) (.1).	325.00	2.50	812.50
12/07/2023	TTM	t/c Mutepe; LSJ re: settlement discussions (.7); t/c email Redmond re: petition for discharge; fees (.2).	325.00	0.90	292.50
12/11/2023	TTM	t/c Orenstein (.3); call with Scott Lassiter re: confirming no liability for registering tanks on Frontage Road (.4); email Scott; t/c Paul Hanna re: Frontage closing amendment (.3).	325.00	1.00	325.00
12/12/2023	TTM	t/c Mutepe re: settlement discussions (.6); conf LSJ re: settlement discussions (.2).	325.00	0.80	260.00
12/13/2023	TTM	t/c from Mutepe re: Gabbe deposition; objection to settlement; t/c Jason (.5); conf LSJ, t/c Jason re: same (.3); t/c Ainsworth re: same (.2); t/c Mutepe; Ainsworth re: Mutepe's objections; draft stipulation extending deadline to respond; email Mutepe same (1.3); t/c Tiffany Thompson (.1); t/c Mutepe, Jason re: settling Mays (.5); t/c Mutepe (.2).	325.00	3.10	1,007.50
12/14/2023	TTM	t/c Jason, Chris, Leon re: settlement (.5); conf LSJ, t/c Mutepe (.5); t/c Mutepe re: settling Mays (.1); t/c Jason re: settlement (.2); review letter from Scott Lasiter; conf LSJ re same, t/c Paul re: signature (.5); sign Frontage Road amendment (.1); t/c Jason, Mutepe; conf LSJ (.5)	325.00	2.40	780.00
12/15/2023	TTM	t/c Jason, Chris; draft consent order resolving Mutepe's objection (1.2); t/c Jason Orenstein re: potential resolution (.3); draft consent order resolving Red Shield Funding objection (.5); t/c Mutepe (.2); t/c Jason; conf LSJ (.4).	325.00	2.60	845.00
12/18/2023	TTM	prep for; attend hearing on motion to approve settlement; travel to/from (8.0); drafting settlement order; edits from LSJ; emailing to all parties (1.4).	325.00	9.40	3,055.00
12/19/2023	TTM	calls with Red Shield Funding; Mutepe; Ainsworth, Jason re: order approving settlement (1.0); t/c Mutepe (.5); Red Shield Funding call, follow up with LSJ (.4); upload order; t/c from Ms. Irby re: order (.3); sending wires to Red Shield Funding, Parker, Williams, and Gabbe (1.3).	325.00	3.50	1,137.50
12/20/2023	TTM	draft stipulation (.4); edits per LSJ; drafting order dismissing case; emailing all parties re: consent to stipulation, order (.6); emails with Red Shield Funding, Orenstein re: stipulation (.4); emails, calls re: signing off on stipulation; order (.3); start working on second distribution worksheet, upload stipulation, proposed order (2.4).	325.00	4.10	1,332.50

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
12/21/2023	TTM	conf DM,EW; email Gabbe, Dudley re: obligations under settlement agreement (.6); start drafting distribution motion (3.4).	325.00	4.00	1,300.00
12/22/2023	TTM	drafting distribution motion; t/c Ainsworth (1.0); continue on distribution motion (.7); same (.6); same (.5).	325.00	2.80	910.00
01/03/2024	TTM	review filings over Christmas (.3); t/c Paul re: due diligence extension (.1); t/c from Ainsworth (.2); t/c from Mutepe (.4); conf LSJ re: distribution motion; email Paul (.2); working on distribution motion (.9); continue same; lengthy conf with LSJ re: distributions (.8); continue prep on motion (1.0).	395.00	3.90	1,540.50
01/04/2024	TTM	drafting disbursement motion (.5); t/c Paul Hanna, Chris Terry re: Frontage (.4); t/c Ronika Jones, vm Deleston, Leahong (.3); t/c Ainsworth; redlining motion to dismiss Long (.4); t/c Joe Guernsey (.2); continue on disbursement motion, drafting exhibits to same, confs LSJ (1.7); same (.7); same; t/c Paul re: Frontage (.4); t/c Ainsworth; Mutepe; conf LSJ re: disbursements (.8).	395.00	5.40	2,133.00
01/05/2024	TTM	conf LSJ (.1); edits to distribution motion (1.5); drafting status report answers; reviewing certificate of service; finalizing and filing disbursement motion, status report (3.7)	395.00	5.30	2,093.50
01/08/2024	TTM	drafting withdrawals for Gabbe based on settlement discussions with Mutepe (1.2); review Lasater fee application (.2); email Deleston (.1); t/c from Mutepe; t/c from Guernsey; conf LSJ re same (.2); t/c from Guernsey (.2); drafting contempt motion (2.1); drafting notice of stay in Darden (.4); finish notice; edits to contempt (.4); filing motion for contempt (.3).	395.00	5.10	2,014.50
01/09/2024	TTM	t/c Chris Edwards re: 1099s (.2); t/c BD & EW re: 1099 calculations (.2); reviewing order granting MMM fees (.1); drafting Milner/Williams motion (1.0).	395.00	1.50	592.50
01/11/2024	TTM	vm Teresa Irby returning call (.1); return Mutepe's call re: Mays status; 1/30 hearing (.5); t/c Ainsworth re: call from clerk; amendments; Long order (.3); edits to Milner/Williams motion (.3); edits to Darden filing (.2); return Belinda Harris's phone call re: filings (.3); conf BD; EW re: 1099 distribution spreadsheet (.2); review supplemental Certificate of service on contempt for Gabbe FedEx (.1); t/c Teresa Irby re: certificate of service, amending Notice of Hearing and Long order (.3); conf staff re: docketing re: Teresa's instructions,; drafting Long order (.8); edit amended notice of hearing per Irby's instructions; conf BD re: 1099 distribution spreadsheet (.5); conf LSJ re: filings, 1/30 hearing (.2); t/c Chris Terry, review Frontage DSD, draft release of same, email to Chris (.6); t/c Ainsworth re: Long order (.2); finalize and upload Long order, conf LSJ re: Darden; draft motion to expedite Milner/William motion; finalize both motions (.7); email Rhonda Thomas re: expedited motion (.1).	395.00	5.40	2,133.00

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
01/12/2024	TTM	t/c Amy Mayer re: filing notice of stay in Darden (.4); drafting order on expedited hearing (.3); research on standard for relief under FRCP 60(b) (1.6); Certificate of service on Milner/Williams and amended Notice of Hearing; conf TV re: same (.2); outlining response to Motion to Amend (1.2); follow up conf TV re: certificate of service (.2); reviewing 1099s calculations (1.0); review and sign Amy Mayer's engagement letter (.1); conf LSJ (.2);.	395.00	5.20	2,054.00
01/15/2024	TTM	conf EW re: updates for report to United States Trustee for Q4 (.4); continue review of 1099 distribution spreadsheet (1.5); research proper recipient of 1099 for attorney's fees distributions; save research re: same (1.2); add attorney's fees distribution by client to spreadsheet; confirm possession of W-9 for each recipient; emails re: same; email with Trish Redmond re: objection to award of attorneys' fees in Mays interpleader; review of objection, try, email same (1.3).	395.00	4.40	1,738.00
01/16/2024	TTM	t/c Chris Edwards re: 1099s; send draft spreadsheet (.1); start drafting response to motion to amend (.9); multiple calls and emails with Chris Edwards re: edits to 1099 spreadsheet re: attorneys' payments as part of creditors gross income and reportable to creditor with potential deduction (.6); t/c Deleston (.2); editing 1099 spreadsheet per conversation with Chris (.5); t/c from Mutepe re: response to motion to amend deadline, Mays interpleader objection (.2); t/c Trish Redmond re: Mays interpleader motion to discharge & attorney's fees (.2); lengthy conference with LSJ re: current action items (1.0); continue drafting response to motion to amend (1.5).	395.00	5.20	2,054.00
01/17/2024	TTM	reviewing & confirming 1099 spreadsheet; confs BD (1.8), finish same, email to Chris Edwards (.5); send Mayfield fees wire to Ainsworth; email Jason re: noncompliant withdrawals (.3); drafting response to motion to amend (1.4); drafting supplement to motion for contempt (1.6).	395.00	5.60	2,212.00
01/18/2024	TTM	t/c Mutepe (.2); finish drafting response to motion to amend (3.1).	395.00	3.30	1,303.50
01/22/2024	TTM	t/c Paul Hanna re: UST timeline (.1); email Brewer re: calculation (.2); t/c Mutepe (.3); final review of supplement to motion to compel; response to motion to amend (.6); t/c Addie Brooks; Ameera Brewer (.3); t/c from Mutepe on Bain attorney fees negotiations (.2); review Hammock people search (.4); reviewing objections filed, finalizing responses and supplement filing supplement and response (1.1).	395.00	3.20	1,264.00
01/23/2024	TTM	email Chris Edwards re: 1099 (.1); t/c from Ainsworth re: Bain fees (.2); t/c from Mutepe re: same (.4); review people search on James Hammock; conf TV (.2); conf TV on mailing, drafting tax letter; t/c Chris Edwards re: same & 2023 tax return for trust (.7); continue on tax letter (.2); prepare for 1/30 hearing, reviewing pleadings; outline argument, conf LSJ re: trial (1.5); drafting letter to Gabbe re: outstanding items (.9); t/c Mutepe (.2).	395.00	4.40	1,738.00

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

Invoice No: 67955

			Rate	Hours	
01/24/2024	TTM	t/c Amy Mayer re: Darden emergency filing (.4); finish letter to Gabbe parties on contempt (.3); drafting Darden emergency filing to stay case pending Bankruptcy Court's ruling on motion to amend and motion for contempt (2.1); t/c Jason Orenstein re: contempt motion, actions to take, email letter on actions after Gabbe's response to Gabbe parties; review exhibits to Darden emergency filing (.4); conf LSJ re: Darden filing (.1); conf BD re: distribution letters on second distribution (.2); t/c from Ainsworth re: Bain negotiation (.2); t/c from Mutepe re: Bain attorney numbers (.2); finalizing Darden emergency motion, proposed order (.7); t/c Mutepe re: Bain attorney fees calculation (.6); conf BS re: response to motion to strike (.2).	395.00	5.40	2,133.00
01/25/2024	TTM	review Darden order; email Amy Mayer (.2); review corrected 1099 sheet; email Chris Edwards re: approvals (.3); t/c Ainsworth re: Bain stipulation status (.4); conf BS, MM re: evidentiary issues research (.1); email Amy Mayer re: Darden withdrawal (.1); working on amendment to motion to disburse (1.4); prepare for 1/30 hearing; t/c Ainsworth re: Bain, t/c Chris Terry re: recordation (1.9); t/c Bridgers, Benjamin, Dudley re: Bain settlement, continue preparing for hearing (3.2).	395.00	7.60	3,002.00
01/26/2024	TTM	multiple calls with Bridgers, Dudley, and Akemon re: stipulation; calculations re: same; drafting stipulation and amendments to motion to disburse (6.4); email lien release to closing attorney for Frontage Road closing (.2); starting drafting proposed order (.3); review edits by Bridger (.2); filing motion, correcting Certificate of service (.6).	395.00	7.70	3,041.50
01/29/2024	TTM	review updated invoices for contempt time (.3).	395.00	0.30	118.50
	TTM	conf DM re: response to beneficiaries (.1); drafting proposed order on distribution (1.4); update bills for contempt fees (.3); prepare for hearing (.6); t/c Ainsworth re: hearing (.5); drafting status reports on Darden order, second on contempt, edits to and file proposed order on distribution motion; conf LSJ re: hearing; finalizing hearing prep with new filings (5.7).	395.00	8.60	3,397.00
01/30/2024	TTM	hearings on motions to disburse, contempt, and amend, travel to/from hearing (5.6); t/c Ms. Thomas re: order, drafting orders on motion to disburse, setting evidentiary hearing, multiple conferences re: 1099 and letter to beneficiaries (1.7); t/c from Ainsworth (.3).	395.00	7.60	3,002.00
01/31/2024	TTM	conf BD re: distribution letters (.2); emails or calls with Taylor, Leahong, Lygia Simmons, Harris re: 1099s, status of distributions (.7); conf LSJ re: distribution timing (.1); t/c Amy Mayer re: Darden report and recommendation (.2); t/c Mutepe re: 1099 forms, explain letter to beneficiaries (.1); review 1099s and confirm with Chris Edwards no 1099s required to be sent to attorneys of beneficiaries (2); preparing fee applications; t/c Rhonda whether specially set required (1.3); conf LSJ re: orders from yesterday's hearing, conf MM re: research (.2); email			

Galardi Liquidating Trust

02/02/2024

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proposed orders to Orenstein, Dudley, and Guernsey (.2).	Rate 395.00	Hours 3.10	1,224.50
For Current Services Rendered		490.80	164,044.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Tom T. McClendon	7.20	\$0.00	\$0.00
Tom T. McClendon	385.40	325.00	125,255.00
Tom T. McClendon	98.20	395.00	38,789.00

Expenses

05/01/2023	Online legal research	318.75
05/02/2023	Postage	0.60
05/02/2023	Postage (3 @ .84)	2.52
05/03/2023	Postage (5 @ .60)	3.00
05/03/2023	Postage (2 @ 2.22)	4.44
05/03/2023	Postage (2 @ 2.46)	4.92
05/10/2023	Postage	2.94
05/19/2023	Postage (32 @ .60)	19.20
05/22/2023	Recording fees for 2 DSDs (Fulton Co)	55.35
05/22/2023	Recording fee for DSD (DeKalb Co)	25.62
05/22/2023	Recording fee for LWD into Galardi Creditors Trust (Frontage Rd)	25.62
05/22/2023	Postage	0.60
05/25/2023	Postage	0.60
05/26/2023	Postage	0.60
06/01/2023	Fee for Online Court Documents (PACER)	16.50
06/05/2023	Postage	0.60
06/12/2023	Postage	0.60
06/15/2023	Federal Express	17.69
06/15/2023	Postage (8 @ .60)	4.80
06/16/2023	Postage	9.24
06/21/2023	Mileage to/from Macon for hearing	119.87
06/21/2023	Postage (2 @ .60)	1.20
06/22/2023	Postage	0.60
06/23/2023	Postage (2 @ .60)	1.20
06/27/2023	Postage	0.60
06/30/2023	Postage	2.22
07/01/2023	Online legal research	250.00
07/01/2023	Fee for Online Court Documents (PACER)	12.80
07/11/2023	Postage (2 @ .87)	1.74
07/12/2023	Postage (21 @ .63)	13.23
07/12/2023	Postage (5 @ .63)	3.15
07/13/2023	Federal Express	23.15
07/13/2023	Federal Express (2 @ 23.84)	47.68
07/17/2023	Federal Express (3 @ 23.89)	71.67
07/17/2023	Federal Express	38.26
07/18/2023	Federal Express (2 @ 23.89)	47.78
07/18/2023	Postage (2 @ .63)	1.26
07/18/2023	Postage (2 @ 2.31)	4.62
07/18/2023	Postage	8.05
07/18/2023	Postage	8.05
07/19/2023	Federal Express	23.20

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

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07/19/2023	Federal Express	29.55
07/19/2023	Postage	1.59
07/25/2023	Federal Express	23.99
07/28/2023	Postage	0.63
07/28/2023	Filing fee - Interpleader complaint	350.00
08/01/2023	Postage	0.63
08/01/2023	Online legal research	125.38
08/01/2023	Fee for Online Court Documents (PACER)	28.90
08/01/2023	Fee for Online Court Documents (PACER)	44.40
08/01/2023	Online legal research	513.88
08/04/2023	Postage (2 @ .63)	1.26
08/04/2023	Postage (3 @ .87)	2.61
08/07/2023	Postage (4 @ 1.83)	7.32
08/11/2023	Postage	0.87
08/14/2023	Transcription fees - US Bankruptcy Court	194.00
08/14/2023	Federal Express	17.01
08/23/2023	Postage (2 @ .63)	1.26
08/24/2023	Postage (4 @ .63)	2.52
08/24/2023	Postage	8.53
08/24/2023	Postage	0.63
08/29/2023	Postage (2 @ .63)	1.26
08/31/2023	Postage (2 @ .63)	1.26
09/06/2023	Mileage to/from Macon for hearing	119.21
09/06/2023	Postage (4 @ .63)	2.52
09/13/2023	Postage	0.63
09/13/2023	Postage	0.63
09/14/2023	Federal Express	32.56
09/14/2023	Federal Express	24.34
09/15/2023	Postage (2 @ .63)	1.26
09/21/2023	Federal Express	43.33
09/26/2023	Federal Express	18.51
09/26/2023	Federal Express	31.99
09/27/2023	Mileage to/from Macon for hearing	119.21
09/27/2023	Parking	2.25
10/01/2023	Online legal research	388.00
10/01/2023	Fee for Online Court Documents (PACER)	16.90
10/04/2023	Recording Fee for Trustee DSD Cancellation - Dekalb Superior Court	25.62
10/10/2023	Postage	0.63
10/12/2023	Postage	0.63
10/12/2023	Federal Express	42.17
10/12/2023	Federal Express	30.53
10/12/2023	Federal Express	50.09
10/12/2023	Federal Express	46.10
10/13/2023	Service on Alexis King - Sprint Process LLC	290.00
10/16/2023	Mileage to/from Macon for hearing	113.97
10/16/2023	Parking	3.75
10/22/2023	Court Reporter Fee - Exceptional Reporting Services Inc	171.45
10/24/2023	Postage (2 @ 2.07)	4.14
10/25/2023	Postage (2 @ .63)	1.26
11/01/2023	Fee for Online Court Documents (PACER)	195.10
11/01/2023	Online legal research	202.38
11/02/2023	Postage	0.63
11/07/2023	Postage	0.63
11/22/2023	Postage (71 @ 1.83)	129.93

Galardi Liquidating Trust

02/02/2024

Re: Liquidating Trustee for Galardi Liquidating Trust

Account No: 2345.006

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11/22/2023	Photocopy charges - Settlement	99.40
11/27/2023	Postage (66 @ .63)	41.58
11/27/2023	Photocopy charges - Distribution Letter	26.40
11/30/2023	Postage (3 @ 28.75)	86.25
11/30/2023	Federal Express	36.70
11/30/2023	Federal Express (2 @ 17.60)	35.20
12/04/2023	Postage	0.63
12/08/2023	Postage (2 @ .63)	1.26
12/15/2023	Postage (74 @ .87)	64.38
12/21/2023	Postage (3 @ .63)	1.89
12/31/2023	Fee for Online Court Documents (PACER)	43.10
01/22/2024	Federal Express	19.21
01/22/2024	Federal Express (2 @ 28.08)	56.08
01/22/2024	Federal Express	32.14
01/24/2024	Federal Express (2 @ 45.40)	90.80
01/24/2024	Federal Express	48.09
01/26/2024	Recording fee for Deed Cancellation (4766 Frontage) - Clayton	25.62
01/30/2024	Mileage to/from Macon for hearing	115.91
01/30/2024	Parking	3.75
01/31/2024	Fee for Online Court Documents (PACER)	161.90
	Total Expenses	5,652.64
	Total Current Work	169,696.64

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *Notice of First Application for Compensation of the Liquidating Trustee of the Galardi Creditors Trust, Deadline to Object and for Hearing* ("Notice") and *First Application for Compensation of the Liquidating Trustee of the Galardi Creditors Trust* ("Application") using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Notice and Application to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

- **Michael Akemon** mutepe.akemon@richardslegal.com
- **Mitchell D Benjamin** benjamin@dcbflegal.com, jessicasorrenti@dcbflegal.com; calendar@dcbflegal.com
- **Charles Bridgers** charlesbridgers@dcbflegal.com, jessicasorrenti@dcbflegal.com; calendar@dcbflegal.com
- **Ainsworth G Dudley** adudleylaw@gmail.com
- **Evan Owens Durkovic** ecfgamb@aldridgepите.com, edurkovic@ecf.courtdrive.com
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- **Will Bussell Geer** wgeer@rlkglaw.com, notices@nextchapterbk.com; willgeer@ecf.courtdrive.com; 2836@notices.nextchapterbk.com; 6717577420@filings.docketbird.com; geer.willb117921@notify.bestcase.com; emiller@rlkglaw.com; jdowardclay@rlkglaw.com
- **Whitney Warnke Groff** whitney.groff@cobbcounty.org
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- **James D. Silver** jsilver@kklaw.com, raldama@kklaw.com
- **Christopher W. Terry** chris@boyterry.com, terrycr40028@notify.bestcase.com
- **U.S. Trustee - MAC** Ustp.region21.mc.ecf@usdoj.gov

I further certify that on this day I served a copy of the Notice *only* on the parties listed on the attached mailing matrix, via U.S. First Class Mail with adequate postage prepaid:

This 2nd day of February, 2024.

/s/ Thomas T. McClendon

Thomas T. McClendon
Georgia Bar No. 431452
Jones & Walden LLC
699 Piedmont Avenue, NE
Atlanta, Georgia 30308
404-564-9300
tmccclendon@joneswalden.com
Liquidating Trustee

Label Matrix for local noticing
113G-5
Case 22-50035-JPS
Middle District of Georgia
Macon
Fri Feb 2 15:49:03 EST 2024

AgSouth Farm Credit, ACA
c/o Fortson, Bentley and Griffin, P.A.
2500 Daniell's Bridge Road
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Athens, GA 30606-6178

American Express National Bank
c/o Becket & Lee, LLP
Attn: Kenneth Kleppinger
P.O. Box 3001
Malvern, PA 19355-0701

Jones Lang LaSalle Brokerage, Inc.
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Devonne Washington
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Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Discover Card
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Salt Lake City, UT 84130-0938

Disney Vacation Club
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Kissimmee, FL 34747-5409

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c/o Kelly Galardi, Trustee
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Document Page 35 of 37

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